



COUNTY OF ROCKLAND
OFFICE OF THE COUNTY EXECUTIVE

Allison-Parris County Office Building
New City, New York 10956

Tel. (845) 638-5122

Fax. (845) 638-5426

C. SCOTT VANDERHOEF
County Executive

November 29, 2002

Mr. Karl Gleaves
Office of the Assistant General Counsel for Ocean Services
National Oceanic and Atmospheric Administration
United States Department of Commerce
1305 East-West Highway
Silver Springs, MD 20910

Dear Mr. Gleaves:

Enclosed for filing with the Department of Commerce respective to the public hearing on the Millennium Pipeline appeal are comments from various County agencies, municipalities, environmental and public service organizations.

After a thorough review by these groups, we expect that the Department of Commerce will join us in concluding that the various alternative routes suggested by the New York Department of State would have significant and adverse effects on our residents and environment.

Sincerely,

C. Scott Vanderhoef
County Executive

CSV/sh

INDEX

ROCKLAND COUNTY NEW YORK RESPONSE LETTERS/MUNICIPAL RESOLUTIONS Millennium Pipeline

1. Hon. C. Scott Vanderhoef, Rockland County Executive
2. R. Allan Beers, Coordinator, Rockland County Division of Environmental Resources
3. Arlene R. Miller, Principal Planner, Rockland County Department of Planning
4. Charles H. Vezzetti, Superintendent, Rockland County Highway Department
5. James W. Hornberger, Assistant Public Health Engineer, Rockland County Health Department
6. Daniel Greeley, Assistant Director, Rockland County Office of Fire & Emergency Services
7. Hon. Steven M. Hurley, Supervisor, Town of Stony Point
8. Hon. Thom Kleiner, Supervisor, Town of Orangetown
9. Resolution from Town of Clarkstown
10. Hon. Howard T. Phillips, Jr. Supervisor Town of Haverstraw
11. Carol G. Brotherhood, Village Clerk, Village of Upper Nyack
12. Diane Gruskin, Executive Director, Environmental Management Council
13. Betty Hedges, President, Rockland county Conservation Association
14. Patricia Soto & June Howard, Co-Presidents, The League of Women Voters of Rockland County
15. Eileen M. Larkin, President, Palisades Civic association
16. Patrick J. Healy, Nanuet Resident

ROCKLAND COUNTY
GOVERNMENT AGENCIES '
RESPONSES



COUNTY OF ROCKLAND
OFFICE OF THE COUNTY EXECUTIVE

Allison-Parris County Office Building
New City, New York 10956

Tel. (845) 638-5122

Fax. (845) 638-5426

C. SCOTT VANDERHOEF
County Executive

November 12, 2002

Mr. Karl Gleaves
Office of the Assistant General Counsel for Ocean Services
National Oceanic and Atmospheric Administration
United States Department of Commerce
1305 East-West Highway
Silver Springs, Md. 20910

Dear Mr. Gleaves:

As Rockland County Executive, I hereby enter into record the County of Rockland's strong opposition to the Millennium Pipeline route alternatives relating to Rockland County as suggested by the New York Department of State (DOS).

The Rockland County portion of the Millennium Pipeline was constructed in 2001 by Mirant Energy and is currently in service supplying natural gas to the Bowline Energy Facility. Working with Rockland officials, the pipeline was placed along existing utility corridors to minimize the impact to residents. This segment of the pipeline will be utilized by Columbia Gas as part of the Millennium Pipeline.

The Federal Energy Regulatory Commission has certified the proposed route after four years of exhaustive environmental study. The United States Department of Environmental Protection Agency and the New York State Department of Environmental Conservation have determined that the certificated crossing of the Hudson River at Haverstraw Bay is acceptable.

An analysis of the route alternatives, as recommended by the Department of State, will have permanent significant and adverse effects on the natural and human environment. The following impacts will occur:

Option #1 - Palisades-Dobbs Ferry Route

This NY DOS preferred option would include locating the pipeline in the wooded buffer parallel to the Palisades Interstate Parkway (PIP) originating in the Village of Pomona for approximately 10 miles, crossing Tallman State Park and entering the Piermont Marsh.

Impact to the Palisades Interstate Parkway

- ✓ The Palisades Interstate Parkway is designated a National Historic Landmark and a scenic byway by the New York State Department of Environmental Conservation. The environmental impact to the PIP would be devastating and change forever the scenic beauty of this parkway.
- ✓ The removal of the wooded buffer along the 10-mile portion of the PIP will directly effect the quality of life for several hundred residents whose properties border the parkway. The wooded buffer serves as an essential noise, visual and air pollution abatement barrier to the heavily traveled road.
- ✓ Construction activities adjacent to the PIP will directly impact thousands of motorists who commute on this heavily populated roadway.
- ✓ Heavy equipment necessary for construction of the Pipeline would significantly damage the newly constructed roadway and drainage systems.

Impact to Tallman Mountain State Park and Piermont Marsh

- ✓ Tallman Mountain State Park will be significantly impacted due to the removal of thousands of mature trees, construction on steep slopes and crossing of small streams.
- ✓ A number of plants in the Park and Marsh are listed as rare, endangered, or of special concern.
- ✓ The Park is listed on the State Register of Historic Places.
- ✓ The Piermont Marsh has been designated a Significant Coastal Fish and Wildlife Habitat under the New York State Coastal Management Program. The same designation as Haverstraw Bay.
- ✓ In 1985 the Village of Piermont designated the Marsh as a Critical Environmental Area, pursuant to NYS Environmental Conservation Law (ECL Article 8).
- ✓ The Park and Marsh are listed in the Hudson River National Estuarine Research Reserve.
- ✓ The Park and Marsh are included in the Tappan Zee Scenic District (ECL Article 49).
- ✓ A number of plant and animal species found in the Marsh are federally classified as rare, endangered, or of special concern.
- ✓ The Park and Marsh are state-owned lands within the Piermont Marsh Reserve and are under the jurisdiction of three state agencies.
- ✓ The "lay-barge" technique proposed for Haverstraw Bay may not be usable at this location. This could cause significant environmental disruption to Piermont Marsh and the Hudson River.
- ✓ Significant blasting and excavating would occur in the State Park.


Other Options - The Palisades / CSX Railroad / Route 117 Alternative

These pipeline options would be constructed along the PIP or the CSX railroad corridor crossing the Hudson River at Hook Mountain State Park.

- ✓ The impact to the PIP and CSX would be the same as listed in alternative Option 1.
- ✓ The pipeline would be placed along Route 303 and residents bordering these highways effecting hundreds of residents and businesses.
- ✓ Significant safety issues would arise from the placement of the pipeline along this route.
- ✓ The pipeline would have to be constructed along steep slopes and mountainous terrain.
- ✓ Hook Mountain State Park and Rockland Lake State Park both listed as National Historic Landmarks, would be adversely effected by construction of the pipeline.
- ✓ The rock outcroppings along the Hook Mountain Bike Trail would be removed.
- ✓ Significant blasting and excavating would occur in these two State Parks.

In conclusion, the alternative routes as suggested by the NYS Department of State will have a devastating long-term permanent effect on Rockland County. For the reasons outlined previously, the County of Rockland will take whatever measures necessary to oppose these alternatives.

Sincerely,


C. Scott Vanderhoef
Rockland County Executive

CC: Hon. Thomas Kliener, Orangetown Supervisor
Hon. Charles Holbrook, Clarkstown Supervisor
Hon. Chris St. Lawrence, Ramapo Supervisor
All Rockland County Legislators



COUNTY OF ROCKLAND
DIVISION OF ENVIRONMENTAL RESOURCES

50 Sanatorium Road, Building P

Pomona, New York 10970

Tel. (845) 364-2670

Fax. (845) 364-2671

Email: beersa@co.rockland.ny.us

C. SCOTT VANDERHOEF

County Executive

November 12, 2002

R. ALLAN BEERS

Coordinator,
Environmental Resources

Mr. Karl Gleaves

Office of the Assistant General Counsel for Ocean Services

National Oceanic and Atmospheric Administration

United States Department of Commerce

1305 East-West Highway

Silver Springs, Md. 20910

Dear Mr. Gleaves;

As Chairman for the Rockland County Pipeline Task Force, I enter these comments into the record at the public hearing held on November 13, 2002.

In 1998, when the Millennium Pipeline was first proposed, the County of Rockland was both the first County to create a Pipeline Task Force to evaluate the impacts the proposed pipeline would have on our residents and environment and the first to file for "intervenor status".

As a result of these actions, the County of Rockland was able to work directly with the Federal Energy Regulatory Commission, the New York State Public Service Commission, local elected officials, Columbia Gas representatives and the public to locate the pipeline in an area where it would have the least impact to our residents and environment. In 2001, Mirant Energy Company constructed the portion of the pipeline that will be used for the Millennium Pipeline. The project was completed with minimal impact to the residents and environment along the route.

We are truly shocked and disappointed that the New York Department of State would suggest alternative routes in Rockland County without contacting our elected officials to discuss what impacts these routes would have on our County.

Be advised that the County of Rockland will be providing additional comments both from the County level, local elected officials, Environmental organizations, Civic Associations and the public. The alternative routes will have significant long-term permanent impacts both to our residents and environment.

The County of Rockland will not become the sacrificial County to benefit a few Westchester County residents.

Sincerely,

A handwritten signature in dark ink, appearing to read "Allan Beers", is written over the word "Sincerely,".

R. Allan Beers

Coordinator of Environmental Resources

Chairman Rockland County Pipeline Task Force

C. Hon. C. Scott Vanderhoef



COUNTY OF ROCKLAND
DEPARTMENT OF PLANNING

Building T
Pomona, New York 10970
(845) 364-3434
Fax. (845) 364-3435

C. SCOTT VANDERHOEF
County Executive

DR. JAMES J. YARMUS, P.E.
Commissioner

ARLENE R. MILLER
Deputy Commissioner

November 25, 2002

Honorable C. Scott Vanderhoef
Rockland County Executive
11 New Hempstead Road
New City, NY 10956

Re: Millennium Pipeline

Dear Mr. Vanderhoef:

This letter is being written to convey our concerns regarding the proposed alternate routes suggested for the Millennium Pipeline. Several of the alternate routes were evaluated. The first alternate route studied was the route that runs along the eastern side of the Palisades Interstate Parkway from exit 12 southeast to just north of Oak Tree Road then turning east toward and heading through Tallman State Park and the Piermont Marsh. The second alternate route evaluated travels southeast on Route 9W and the CSX right-of-way, then south along the CSX Railroad line right-of-way, then turns east heading over West Hook Mountain and Hook Mountain State Park. The third and fourth routes evaluated were the routes that continued east on the original proposed route, then head either north on the existing electric transmission right-of-way from Bowline to the Lovett Plant or the CSX railroad right-of-way to the Lovett Plant Hudson River crossing.

The location of the first alternate route raises serious environmental and historic related concerns. The Palisades Interstate Parkway has been listed on the National and State Historic Registers since 1999 through the New York State Office of Parks, Recreation and Historic Preservation. The Parkway, designed for the purposes of providing a scenic, recreational drive, was used as a model for other present day scenic byways and parkways including the Blue Ridge Parkway in North Carolina, Saw Mill River, Hutchinson River and Cross County Parkways in New York. Its unique historic and natural amenities, as well as its design, are what contributed to this prestigious designation. Some of its amenities include the stone bridges with their unique archways,

the planting of select specimen landscaping within the center median area, the forested buffered areas along the roadside, the linkages to historic sites within Rockland County, the scenic views, the innovative roadway design, and the use of a park-like corridor to connect parkland to urban areas. Without a doubt, the forested buffered areas, the scenic views, the park-like corridor connecting people with parks and the arched stone bridges would all be compromised with the construction of the pipeline. The historic significance would also be minimized since many of the important features that contributed to the parkway's nomination to the registers would be eliminated or severely compromised.

The Palisades Interstate Parkway has also been designated as a Scenic Byway. This designation provides recognition of the special qualities and resources of a particular byway corridor. A Scenic Byway Corridor Management Plan, undertaken by the Palisades Interstate Park Commission, was just completed in June 2002. This study was undertaken to help preserve and enhance the Scenic Byway and its valuable resources. Implementation of the plan is expected to provide benefits to the communities along the corridor by enhancing the quality of life, providing more recreational opportunities, improving scenic qualities, preserving the historic parkway and parks, increasing tourism and improving parkway and park services. The necessary denudation of the landscaping along the eastern right-of-way of the Parkway for the pipeline installation would cause irreparable damage to the integrity of the park-like roadway and its scenic qualities.

It is important to note that many of the goals of the Corridor Management Plan would be undermined with the construction of the pipeline. Some of the goals, and the objectives listed to attain those goals are listed below.

- Preserve and enhance the quality of the existing historic parkway character and Scenic Byway Corridor. Suggested objectives are to preserve naturalized vegetation, to guide future changes in a manner compatible with the original historic Parkway design character, and to prepare and adopt a set of design guidelines to serve as the basis for making detailed design decisions for all future changes to the Parkway. The pipeline construction project would clear most, if not all, of the natural forested buffered areas along the roadway, impede with maintaining the Parkway in its original historic design, drastically change the characteristics of the corridor, losing its scenic qualities. The pipeline construction would therefore be inconsistent with this goal, and the preservation strategies that are to be implemented with the Scenic Byway designation.
- Establish the Parkway as the primary gateway to outdoor recreation and tourism opportunities within Rockland and Orange counties and the Hudson Highlands Region. The New York State line is just south of the proposed alternate route for the pipeline construction. Shortly after entering the state line, the unique scenic and historic qualities of the corridor would be undermined with the denudation of the vegetated areas along the eastern right-of-way of the roadway. The gateway for all of the visitors to the region would be certainly compromised and the visitors'

enjoyable experience in a unique, scenic and natural corridor greatly diminished.

- ✚ Establish maintenance guidelines and standards and establish a permanent source of funding for maintenance and management of the Parkway landscape. In order to attain this goal, the PIPC would have to work with Parkway neighbors to manage and maintain adequate vegetative buffers between the Parkway and adjacent development or provide consistent maintenance of the complete parkway landscape, including the travel lanes, shoulders, median and right-of-way. The pipeline construction would make this goal, along the eastern right-of-way, unattainable due to the removal of all or most of the forested buffered areas. The corridor would also be inconsistent from the West Side to the East Side, undermining the design standards originally conceived and implemented.
- ✚ Develop interpretive programs to encourage resources stewardship and improve public awareness of the regional environmental setting and the historical context of the parkway and the scenic byway corridor. Ways in which to attain this goal are to develop a stewardship program for parkway neighbors to encourage replanting of the parkway corridor in cooperation with the Palisades Interstate Park Commission and to focus on the upcoming centennial celebration as an opportunity to communicate Parkway stewardship and preservation issues. The construction of the pipeline would most certainly make the partnership impossible. Removal of the vegetation along the eastern roadside would demonstrate poor stewardship, and put the onerous on the private property owners to provide the entire buffer along the Parkway.

The public and their representatives raised specific concerns and issues during the Corridor Management Plan process. A repeated concern expressed by the public was with the conceptual proposal of placing a hiking/biking trailway called the Palisades Trailway along the right-of-way of the corridor. The residents' concerns focused on the loss of the tree buffer between the adjoining residential areas and the Parkway, the potential impacts to the historic character of the stone-faced bridges, the possible impacts on residential land values, and the possible impacts to wetlands and natural habitats. The denuding of the vegetation along the eastern right-of-way of the Parkway would definitely make these concerns valid. The buffered areas would be compromised if not lost, the natural habitats destroyed, the wetlands impacted, and the potential for their land values to decrease.

A second major issue cited in the study was highway noise. As the highway has become more of a commuter roadway, traffic volumes have increased as well as the associated noise levels from the increased traffic. The residents' concerns focused on noise levels exacerbated by waning vegetation within the parkway buffers. As a means of addressing this concern, the Corridor Management Plan specifically provides recommendations for replenishing the landscape buffer and understory with deciduous

trees. The plants are to be consistent with the design objectives of the original Parkway plan. The Plan further acknowledges and recommends maintaining and augmenting the natural buffer as a noise mitigation measure. Again, the location of the pipeline along the right-of-way would be in direct conflict with the goals and objectives of the Corridor Management Plan, and would undermine the preservation efforts of maintaining the Palisades Interstate Parkway as a Scenic Byway.

The Parkway landscape design plan was another major issue detailed in the study. The Parkway landscaping was originally designed with the forested buffers along the roadside, with the specimen vegetation planted in the median. Over the years, these buffered areas and landscaped medians have been neglected. The plan specifically indicates that the buffers need to be better maintained and landscaped, conservation easements and land acquisition needed to strengthen the buffers and the “bald patches” replanted along the roadway. The construction project would not only reduce or eliminate the buffered areas, but would also create extensive “bald patches” along the roadside, and make the land acquisition and conservation easement additions useless.

Obviously, the intent of the Corridor Management Plan and many of the goals and objectives would be either compromised or unattainable if the pipeline were to be constructed on the eastern side of the Parkway. Throughout the study, the importance of the buffered-forested areas along the roadside was highlighted. In fact, maintaining and enhancing landscaped buffers was cited as a critical implementation strategy in the Corridor Management Plan. The buffers are recognized as serving two very important functions: screening the road from adjacent development, and screening adjacent development from the road (the original design intent of the road). These buffers as well contribute to the scenic qualities of the road and provide an important sound buffer for adjacent residents from the Parkway noise.

As a result of completing the Corridor Management Plan, one of the next recommendations to pursue was the designation of the Palisades Interstate Parkway (PIP) as a National Scenic Byway. To be eligible for this designation, a corridor must possess one or more of six intrinsic qualities (archaeological, cultural, historic, natural, recreational, and scenic – the PIP has clearly five of the six!), have a community committed to its designation and management, and have a corridor management plan developed. This designation would make the Palisades Interstate Parkway only one of three roads in New York State with such a distinction!

The New York State Department of Transportation recently completed reconstruction of Phase One of the Palisades Interstate Parkway spending well over \$65 million. The project, phase one of a two phased project, caused great public outcry and concerns. The actual construction of the project took longer to complete than anticipated, caused significant traffic problems and backups, and was extremely costly. The construction of the pipeline would literally be a completely new reconstruction project, digging up all of the recently installed drainage systems along the grassed pull-off areas, require repaving of the entire length due to construction vehicle damage, clearing further into the buffered forested areas along the roadside reducing the buffered area even more,

) causing traffic congestion and lane closures on a highly traveled commuter route, and wasting millions of tax payers dollars which was spent on the recently completed reconstruction project.

Finally, the construction of the pipeline along the Palisades Interstate Parkway would encroach on only three private properties if constructed with either a 50 foot or 75 foot wide corridor in the towns of Ramapo, Clarkstown and Orangetown. However, if a 100-foot wide construction corridor were used for the construction, many more private properties would be affected. Close to 50 private properties would have a direct impact if the alternate route would require a 100-foot construction corridor. It should be noted again, that the construction of the pipeline within any of the measured widths would result in denudation of the forested buffered areas and therefore have a direct impact on over 475 properties! Since the pipeline cannot go under or over the bridges crossing the Parkway, the pipeline would have to be routed around every structure at each intersection. This would entail the taking of more area, possibly as wide as 200 feet, to incorporate the design standards necessary to construct the pipeline. Many of the properties adjacent to the intersections would be impacted. A 200-foot buffer the entire length of the parkway would impact over 400 private properties. Again, as previously stated, even if the private properties were not infringed upon, the buffered forested areas adjacent to the properties would be compromised, impacting basically all of the 475 + properties that are adjacent to the Palisades Interstate Parkway.

) Traveling eastward once off of the Parkway, the proposed alternate route would be constructed within Tallman State Park and the Piermont Marsh. The Village of Piermont has a Local Waterfront Revitalization Program which was adopted by the Village of Piermont Board of Trustees on January 7, 1992, approved by the Secretary of State on February 18, 1992 and concurred by the U.S. Office of Ocean and Coastal Resource Management on May 27, 1992. Some of the benefits of having a Local Waterfront Revitalization Program is to promote waterfront revitalization, promote water-dependent uses, protect fish and wildlife habitats, protect and enhance scenic areas, protect and enhance historic area, and protect and enhance public access. The southern boundary of the Village is home to the Piermont Marsh, a freshwater tidal marsh encompassing over 1000 acres. It is an important fish breeding area in the Hudson River. The Piermont Marsh has also been designated as a National Estuarine Sanctuary. This boundary extends southward from the southern side of the Piermont Pier to the southern boundary of Tallman State Park. The proposed alternate pipeline route, if located in this area, would cause severe degradation to the pristine freshwater wetlands and estuary, and harm the fish and wildlife population that have their habitats in this sensitive area. The wildlife habitat that is located within Tallman State Park would also be degraded since large areas of vegetation would be removed for construction and installation of the pipeline within the park boundary.

The proposed alternate location would also cross within the Tappan Zee Scenic District. This District, which runs from Rockland Lake Landing to the south of Snedens Landing (just south of the Piermont Marsh and Tallman State Park), is about a mile on either side of the shoreline. The New York State Department of Environmental

Conservation (DEC) designates the District. Local governments within jurisdiction of the Tappan Zee Scenic District are encouraged [by the DEC] to prepare a plan for the management of the lands and waters within the Tappan Zee Scenic Area consistent with the valuable scenic, ecologically important, recreational and historical resources. This plan shall be consistent with the needs and desires of the residents of the area and with appropriate state and federal agencies, and comprise of a map showing the boundaries of the area, a program for the management of existing and future land and water uses, fully reflecting the application of management techniques available to various levels of government and to private landowners, and a program for coordinated implementation of the plan by assignment of responsibility to the appropriate governmental unit at the State, Federal, county and local levels. Construction of the pipeline in the Tappan Zee Scenic Area would be inconsistent with the goals of the designation, and would not reflect the desires of the residents of the area or County representatives.

The pipeline would also have to cross through the Palisades sill, a unique geological formation consisting of igneous rock. Extensive blasting and removal of rock would have to be done in order to construct the pipeline. The views from Tallman State Park, the Hudson River, and the Westchester communities would be undermined with the construction project. The Long Path, a regional hiking trail that travels from the western terminus of the George Washington Bridge north to the Adirondacks also crosses this section of the proposed alternate pipeline location. This trail has been in existence since the early 1960s, and has great cultural and historical significance. The trail path has been located on the old Indian paths, and provides magnificent views of the Hudson River, the valley below, and provides panoramic views of Rockland County. The pipeline would also cross the Hudson Valley Greenway Trail that has been dedicated in Tallman Mountain State Park. The construction of the pipeline through Tallman Mountain State Park would negatively impact the hiker's as well as park user's experience and cause irreplaceable damage to the view sheds.

The second alternate route is proposed to travel southeast along Route 9W and the CSX railroad right-of-way, then south along the CSX Railroad line, and finally turning east heading over West Hook Mountain and Hook Mountain State Park. Many sections of both the Route 9W corridor and the CSX right-of-way are very narrow. In many areas, the roadway and railroad run alongside each other. To place the pipeline along this stretch would be extremely difficult to do. Also, the placement of a gas pipeline along a rail line raises some safety issues and concerns. First, is there an adequate right-of-way to place the pipeline alongside the rail line? Next, will the construction equipment damage any of the rail line during the construction process? If a train were to derail, would there be any safety issues with damage to the pipeline, leakage of fuel, fire?

As the trail heads east, it would be transversing through a portion of the Palisades sill that comprises West Hook Mountain and Hook Mountain State Park. This rock formation is unique in that it has a vertical hexagonal-shaped igneous composition that is found in only a few places in the world. This area of the County is very steeply sloped, and has been identified at both the County and Town level as an important ridgeline to protect. In fact, the Town of Clarkstown is currently purchasing the West Hook

Mountain area as part of their open space program. Since the pipeline would not be able to traverse the steep slopes, tons of rock would have to be blasted during construction that would eliminate the value of the land and its scenic and natural qualities. Hook Mountain State Park has spectacular views of the Hudson River Valley, the Villages of Upper Nyack, Nyack and South Nyack, Rockland Lake State Park, and the entire western portion of the County. This is a prominent mountain, that is both an historic, cultural, natural, and biological treasure. Hook Mountain is notorious for bird watching, and is home to many endangered birds including the Bald Eagle. These would all be lost if the pipeline was constructed and the mountain blasted during the construction process.

The vertical hexagonal-shaped rock formations make a less than stable mountain. Tallis piles at the base of Hook Mountain attest to the vulnerability that exists with the slopes. Blasting of this columnar formation would create more vulnerable hillsides, particularly to the south where the quaint Village of Upper Nyack is nestled.

There are also two hiking trails that traverse this area. The first is the Long Path, a regional trail that traverses the highlands of the mountains. This trail has been recognized as an important hiking trail in the County and region, and if blasting were to occur, the trail's integrity would be lost and the spectacular views from the trail eradicated. The New York/New Jersey Trail Conference has been working along with the PIPC, Town of Clarkstown, Village of Upper Nyack, and the County of Rockland to reroute an unsafe portion of the trail to the top of West Hook Mountain. That dream is nearing success, and the pipeline construction would desecrate the ridge tops, making the years of work in vain.

The second trail that would be impacted, if not destroyed by the pipeline construction, is the Hudson River Valley Greenway Trail that traverses along the river's edge. This trail is a very popular trail, and is heavily used by hikers, bikers, fishermen and horseback riders. It offers grand views of the Hudson River, while providing the rare opportunity to access the river. The blasting of the rock for construction of the pipeline would destroy the backdrop of the trail, spoil the view-shed and integrity of the trail.

This section of the pipeline is also within the Tappan Zee Scenic District. The District runs from Rockland Lake Landing to the south of Snedens Landing and is about a mile on either side of the shoreline. The New York State Department of Environmental Conservation (DEC) designates the District. Local governments within jurisdiction of the Tappan Zee Scenic District are encouraged [by the DEC] to prepare a plan for the management of the lands and waters within the Tappan Zee Scenic Area consistent with the valuable scenic, ecologically important, recreational and historical resources. This plan shall be consistent with the needs and desires of the residents of the area and with appropriate state and federal agencies, and comprise of a map showing the boundaries of the area, a program for the management of existing and future land and water uses, fully reflecting the application of management techniques available to various levels of government and to private landowners, and a program for coordinated implementation of the plan by assignment of responsibility to the appropriate governmental unit at the State, Federal, county and local levels. Construction of the pipeline in the Tappan Zee Scenic

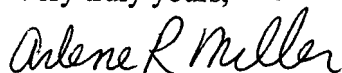
) These two alternate routes studied would cause irreparable damage to many natural, cultural, historical, biological resources in Rockland County. As described, the alternate pipeline locations would be inconsistent with designations, studies, goals and objectives of many Federal, State, intrastate, County, and local agencies and programs including: the U.S. Office of Ocean and Coastal Resource Management, the New York State Department of Environmental Conservation, the New York State Estuarine Program, the New York State Office of Historic Preservation, the New York State Department of State, the New York State Department of Transportation, the Coastal Zone Management Program, the Palisades Interstate Park Commission, the Hudson River Valley Greenway Council, the New York/New Jersey Trail Conference, the County of Rockland, the Towns of Clarkstown, Orangetown and Ramapo, the Villages of Upper Nyack and Piermont. The pipeline construction in these routes would also reverse years and decades of hard work efforts in land conservation, natural resource protection, view shed preservation, and historic and cultural resource protection. For these reasons, the first and second alternate routes of the Millennium Pipeline must not be considered as viable routes.

The third and fourth options for rerouting the pipeline are much more viable. The route would follow the already approved route before heading north. The third alternate route would have the pipeline follow the existing right-of-way easement of the electric transmission line from Bowline to the Lovett Plant. Construction damage however, would be minimal since the vegetation has been cleared for the electric easement. The fourth route option that is proposed to travel north along the CSX line would raise the same questions previously discussed, regarding safety issues and the railroad right-of-way. However, there are not as many environmentally sensitive areas, special designations or historic amenities that would warrant relocation of the pipeline.

Given all of the factors cited above, the alternate routes that travel south through the County would be destructive to the environment, historic amenities and natural resources, intrusive to the communities and residences adjacent to the routes, and be in conflict with the numerous designations, studies, and goals that have evolved from decades of work aimed at preserving the beauty of the County. The two routes studied that head north, would be more desirous options, and warrant further investigation as viable alternate options.

We appreciate the opportunity to comment on the pipeline relocation. If you have any questions, please contact me at 364-3448.

Very truly yours,



Arlene R. Miller
Principal Planner

C: R. Allan Beers



COUNTY OF ROCKLAND
DEPARTMENT OF HIGHWAYS

23 New Hempstead Road
New City, New York 10956
(914) 638-5060
Fax. (914) 638-5037
Email: highway@co.rockland.ny.us

C. SCOTT VANDERHOEF
County Executive

CHARLES H. VEZZETTI
Superintendent of Highways

-MEMORANDUM-

November 26, 2002

TO: C. Scott Vanderhoef
County Executive

FROM: C. H. Vezzetti
Superintendent of Highways

SUBJECT: Alternate Routes to Millennium Pipeline

The following comments are offered by the Highway Department in response to the alternate routes suggested by the New York Department of State:

Alternative #1 – Palisades - Dobbs Ferry Route: *This proposed alternative involves locating the pipeline in the wooded buffer parallel to the Palisades Interstate Parkway (PIP) originating in the Village of Pomona for 10± miles, crossing the Tallman Mountain State Park and entering the Piermont Marsh.*

Routing the Millennium gas pipeline along the PIP corridor could be relatively simple and with minimal negative impacts if the surrounding areas were undeveloped and roadway crossings were spaced several miles apart. However, the area surrounding the PIP is developed, and the proposed route would involve pipeline construction within some of the most congested and heavily developed residential and commercial areas in Rockland County. In addition, the pipeline construction will cross twenty (20) state, county and local highways/roads listed below:

New York State Roads	Rockland County Roads	Town Roads
Route 202	New Hempstead Road	Ludvigh Road
Route 45	West Clarkstown Road	West Nyack Road
Route 304	Middletown Road	Van Wyck Road
Thruway	Town Line Road	Kings Highway
Route 59	Sickletown Road	
Route 303	Convent Road	
Route 340	Orangeburg Road	
	Western Highway	
	Washington Street	

The pipeline will have to be routed around the footprints of PIP bridge substructures (foundations), including bridge wingwalls at these roadway crossings. The options available are to move the pipeline onto parkway roadway or out onto local roads crossing the parkway. Installing the pipeline below the parkway pavement would surely be unacceptable to both the NYSDOT or the pipeline installer. Construction on roads crossing the parkway will severely impact traffic (causing congestion, delays, detours, etc.) on some of the county's most heavily traveled thoroughfares as lanes, or entire roadways, may have to be closed while the pipeline is installed. The route includes eight (8) undergrade roadway crossings (PIP crosses over roadway) including the crossings at the Thruway and Route 202. Since PIP bridge structures may not satisfactorily accommodate a 24" gas main, pipeline operators may be forced to bury the pipe and this will require deep trenching along the PIP corridor to lower the profile of the pipeline so it can pass beneath the road crossed.

Construction related traffic impacts could be lengthy, especially at undergrade crossings, because the pipeline will have to be installed through/under/over/around a maze of existing underground utilities including drainage, sanitary sewer, gas, water, cable TV and electric lines. Routing the pipeline through the Bardonia/Nanuet area will be particularly onerous because a 7000' section of the line will cross Ludvich Road, NYS Route 304, the Thruway (including the cloverleaf at the Thruway/PIP connection), West Nyack Road and NYS Route 59.

Traffic impacts will adversely impact business and commerce in the surrounding areas and add to the costs of doing business in Rockland County. Further exacerbating the situation will be the constant flow of heavy construction vehicles transporting materials and equipment over local roads and the PIP along the proposed route. This traffic will add to traffic congestion, distress existing roadway pavements and possibly underground utilities, and have a negative impact of the quality of life of residents living along and near the route.

The proposed route also crosses over the tracks of the heavily traveled CSX Riverline in Orangetown. This line reportedly carries between 150 and 250 freight trains per week. Other features crossed along the proposed route include Lake Tappan (a public water supply reservoir), the Sparkill Creek (crossed twice), a large tributary of the Sparkill Creek, and several small unnamed brooks and streams.

Alternative #2 – CSX Railroad/Route 117 Alternative: *This proposed alternative involves constructing the pipeline from the Town of Haverstraw along the CSX railroad corridor with the pipeline crossing the Hudson River at Hook Mountain State Park. A variation of this route involves extending the pipeline southward along the CSX corridor to the PIP Route(Alternative #1) and the Tallman Mountain State Park/Piermont Marsh river crossing.*

The Highway department was involved in replacing four county bridges over the Riverline railroad tracks. In dealing with the railroad, we learned that they are keenly aware of their rights within their right-of-way (ROW), and will not permit any activity that interferes with rail operations. Anyone working within their ROW must deal with them on their terms and in our opinion, they would probably make a legal challenge to any attempt at construction within their ROW that is unacceptable to them.

In addition, the proposed CSX corridor route has the same problems and will produce the same negative impacts on traffic, roads, business and commerce, and quality of life as the PIP route. The route goes through the heavily populated residential areas of Congers, Valley Cottage and the Village of Haverstraw. In fact, the

Village of Haverstraw is, in reality, an urban area, and the heavy construction required for installing the pipeline would severely impact the area.

There are nine (9) roadway crossings along the proposed route and these are listed below:

New York State Roads	Rockland County Roads	Town Roads
Route 9W	Railroad Avenue	Samsondale Avenue
	Congers Road	Short Clove Road
	Kings Highway	Gilcrest Road
		Crusher road
		Christian Herald Road

Two of these crossings, Railroad Avenue and Congers Road are grade crossings, and another, Crusher Road, is an undergrade crossing. Some excavations along the route will surely involve blasting particularly along Route 9W around the Short Clove Road and Hook Mountain Park areas. The route extends through the Haverstraw Rail Tunnel and CSX would probably prohibit any construction within this structure. Consequently, the pipeline would have to be routed around the tunnel and the Route 9W/304 intersection to return to the CSX corridor, or routed through the Hook Mountain Park to the proposed river crossing.

Extending the pipeline along the CSX corridor to the PIP route will take the pipeline construction across the eight highways/roads listed below and a section of Hackensack River (to be crossed twice) connecting the Lake Deforest and Lake Tappan public water supply reservoirs:

New York State Roads	Rockland County Roads	Town Roads
Thruway	Leber Road	Snake Hill Road
Route 59	Orangeburg Road	Erie Street
		Mountainview Road
		Highview Avenue

Alternative #3 –Thruway/Algonquin ROW Palisades-Thruway Intersection to Route 304: *This proposed alternative originates at the Kakiat Park in the Town of Ramapo, follows the Algonquinn Pipeline ROW to the Village of Suffern, links up to the New York State Thruway, runs eastward along the thruway corridor to the PIP Route (Alternative #1) and the Tallman Mountain State Park/Piermont Marsh river crossing. A variation of this route involves installing the pipeline from Thruway Corridor in Nanuet southward along residential streets in Nanuet and Pearl River into Bergen County, New Jersey where it will turn eastward to Tennessee ROW river crossing.*

The route proposed will involve fifteen (15) roadway crossings along the thruway corridor (see Table below) plus another twelve roadway crossings along the PIP route south of the thruway. Since Route 59 crosses the thruway at several places in the Town of Ramapo, the proposed route will cross Route 59 four (4) times. The addition, the pipeline will cross New Jersey Transit and/or CSX railroad tracks in three (3) places, the Ramapo River twice, Lake Antrum in Suffern, and the Pascack Brook. Construction at these crossings will spill out beyond the thruway corridor and onto local streets.

New York State Roads	Rockland County Roads	Town/Village Roads
Route 202	Hemion Road	4 th Street
Route 59(4 crossings)	North Airmont Road	Scotland Hill Road
Route 45	Spook Rock Road	
	College Road	
	Saddle River Road	
	Pascack Road	
	Middletown Road	

Similar conditions will exist along the Route 304 corridor. The proposed route will bring the pipeline through heavily developed and congested areas of Nanuet and Pearl River in Rockland, and Montvale, Rivervale, Old Tappan and Northvale in Bergen County.

Alternative #4 –Palisades/Algonquin South Mountain to Lovett Station: *This proposed alternative consists of several variations wherein the proposed pipeline originates somewhere along the existing pipeline in Pomona or West Haverstraw and runs northeast through three proposed corridors (PIP, CXS and Electric Transmission ROW) to either the Algonquin ROW river crossing or the Lovett Station river crossing.*

The primary route proposed for this alternative is the PIP corridor to the Algonquin ROW that crosses the Hudson River. Although this route is relatively devoid of the residential and roadway congestion occurring south of Pomona, installation of the pipeline northeast through Stony Point will involve large changes in grade and a substantial amount of blasting (because bedrock is shallow in this area). The work will undoubtedly involve construction of a canyon through the rocky, hilly areas to provide for future maintenance of the pipeline.

The CSX ROW Route may not be feasible because of objections from, or requirements imposed by the railroad.

The Electric Transmission ROW is located through the most congested residential areas of the Towns of Haverstraw and Stony Point. The pipeline would have to be installed along local roads within municipal rights-of-ways or on private properties. This route would adversely and permanently affect all commerce and business in these communities.

In conclusion, construction of any of the proposed alternatives will create havoc on highways/roads in Rockland County, and in communities surrounding the route in addition to causing severe environmental distress within the county. Moreover, installation of a second gas pipeline across Rockland County makes little economic sense considering there is an existing line running across the county to the Hudson River.



County of Rockland

ROCKLAND COUNTY DEPARTMENT OF HEALTH
The Dr. Robert L. Yeager Health Center
50 Sanatorium Road
Pomona, New York 10970

C.SCOTT VANDERHOEF
County Executive

JOAN FACELLE, M.D.
Commissioner of Health

November 25, 2002

C. Scott Vanderhoef
County Executive

FROM: James W. Hornberger, PE
Associate Public Health Engineer

Millennium Pipeline Proposal
Alternative Routes Review

As requested, this comprises the Department's review of the alternate routes of the proposed Millennium Pipeline.

Option #1- Pomona to Dobbs Ferry Route

This option has the pipeline running from Pomona to the Tennessee ROW in Palisades, by following the Palisades Interstate Parkway (PIP). Locating the pipeline parallel to the PIP would have a **direct** impact upon **ten** Public Water Supply (PWS) Wells, including two operated by United Water NY (#19 & #25).

In addition, the ground water protection zones for these wells and **five additional** PWS wells (including UWNY #8, #11 & #12) will be effected by the pipeline construction.

Option #2- CSX Railroad Route

This option has the pipeline running parallel to the CSX rail bed from Haverstraw through West Nyack to Orangeburg at the PIP Interchange 5. This route would put the pipeline construction through, or very near, **four** Inactive Hazardous Waste Sites. This route has the pipeline adjacent to the Hackensack River in West Nyack, from which the Village of Nyack draws water for its water supply. In Blauvelt, the UWNY Well #15 protection zone lies in the path of the pipeline construction. This route has the pipeline running parallel to the PIP from Interchange 5 south to the Tennessee ROW. Thus the UWNY wells #8, #11, #12 & #25 are effected in the same manner as in Option #1 above.

Administration 364-2513
FAX 364-2628

P.H.Nursing. 364-2534
FAX 364-2659

Environmental Health 364-2608
Health Education 364-2501

P.H.Social Work 364-2620
FAX 364-2093

Given the proximity of the pipeline construction to Inactive Hazardous Waste Sites, this presents a possible risk of exposure, of county residents and pipeline workers, to hazardous substances should these sites be disturbed. Given the stress upon Rockland County's water supplies, due to the current drought, the Department believes that these Options put the PWS at risk. We cannot afford to have significant portions of our water supply system go down for **any** length of time.

These options, or any others proposing a southerly route of the pipeline through Rockland County, are but a means to an end; minus even a cursory review of the health and environmental impacts or sound engineering practices.



COUNTY OF ROCKLAND
OFFICE OF FIRE and EMERGENCY SERVICES
Rockland County Fire Training Center
35 Firemen's Memorial Drive
Pomona, New York 10970
(845) 364-8800
(845) 364-8961 Fax



C. SCOTT VANDERHOEF
County Executive

GORDON W. WREN JR.
Director of Fire and Emergency Services

MEMORANDUM

To: Allen Beers
Parks Department

From: Daniel Greeley
Assistant Director

Date: November 25, 2002

Subject: Alternative Routes

As per your request, I have reviewed the alternative routes for the Millennium Pipeline. This pipeline, which would be going through a highly populated area, would be disastrous if it should fail.

However, I have several concerns about the alternative routes, which are:

1. The Palisades Interstate Parkway is a major evacuation route in the event of an incident at the Indian Point Nuclear Power Plant and other emergencies. Should there be a leak or failure in this pipe, this evacuation route would be closed down; therefore, it would hamper evacuation in the event of an emergency. The bottom line is that this is not a good alternative.
2. CSX Rail Line to Rte. 303 -- Rte. 303 is also a major evacuation route. If closed, it would hamper evacuations. As far as CSX, this option is probably the worst. In the event of a train derailment involving hazardous materials, such as acid or flammable solvents, they could seep into the ground and cause damage to the pipe. The failure may not occur right away, but the pipe deterioration from the chemical could take time. The other concern during a derailment would be products, such as propane. A 30,000 gallon tank of propane exploding would leave a very large crater and possibly cause damage to this pipeline.

We shall serve the people of Rockland County well by providing needed services in a high quality, ethical, courteous, timely and cost effective manner.

Back in 1996, we had a major derailment in Stony Point, and last month, we had a chemical tanker leaking on the same rail. This rail is primarily freight. Should it be decided to place this pipeline along this rail line, we are asking for trouble.

I have enclosed a copy of the established evacuation routes for the County of Rockland. It would not be in our best interest to place a large gas line along any of these routes.

Should you have any questions, please feel free to call me at Ext. 8800.

DG:pg
329-02

WHEREAS, for the reasons set forth herein the Town Board of the Town of Clarkstown wishes to enter its strong objection to the possible relocation of the Millennium Pipeline and to join with Rockland County and all other affected communities to oppose same;

NOW THEREFORE, be it

RESOLVED, that the Town Board supports the efforts of Rockland County, its County Executive, C. Scott Vanderhoef, and the Division of Environmental Resources of Rockland County, in opposing any alternative routing of the Millennium Pipeline as recommended by the New York State Department of State, and in particular the suggestion that the pipeline be located so as to run parallel through any portion of the Palisades Interstate Parkway property, and be it

FURTHER RESOLVED, that the Town Board is of the opinion that the following rationale supports its determination:

1. The Palisades Interstate Parkway (PIP) is a designated evacuation route and is part of the Indian Point Evacuation Plan; should any emergency occur simultaneously with an incident or casualty affecting the pipeline, the effect could be catastrophic to Rockland County residents and prevent evacuation of thousands of individuals

ROCKLAND COUNTY
TOWNS and VILLAGE'S
RESPONSES



Town of Stony Point

74 EAST MAIN STREET
STONY POINT, NEW YORK 10980

TEL: (845) 786-2716
FAX: (845) 786-3248

November 20, 2002

Mr. Karl Gleaves
Office of the Assistant General Counsel
for National Oceanic & Atmospheric Administration
United State Department of Commerce
1305 East West Highway
Sliver Springs, MD 20910

Dear Mr. Gleaves:

As the Supervisor for the Town of Stony Point in Rockland County, I hereby enter into the record, the Town is strongly opposed to the millennium pipeline alternatives relating to a proposed route through the Town of Stony Point suggested by the New York State Department of State.

The already approved and certified route was developed after years of environmental study and public participation. The certified crossing of the Hudson River at Haverstraw Bay was done to minimize the adverse effect on our residents and the environment.

These alternatives do the opposite of the approved plan and very much negatively affect our Town residents and our environment.

The Town of Stony Point has an approved local Waterfront Revitalization Plan, which was approved by the Department of State and this suggested alternative Plan #4 that runs through Stony Point is not in conformance with this approved Waterfront Plan and the Department of State should be aware of this non-compliance issue and not have recommend this alternative route.

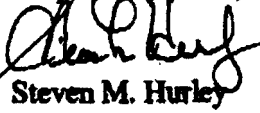
The other issue is the obvious terrain and to install such a line through this area would require blasting. This alone would affect the home on wells and there are about 300 wells along that route. This would negatively impact my residents during and after construction.

Mrs. Karl Gleaves
November 20, 2002
Page 2

I respectfully request these issues be investigated before this matter moves forward. The Town believes that the already certified route is the proper way for this gas line to cross from Rockland County to Westchester County.

I believe your agency will recognize this and direct all interested parties to construct as originally proposed and approved.

Respectfully yours,



Steven M. Hurley
Town Supervisor

SMH:ich

cc: Town Board Members



Town of Orangetown

Town Hall 26 Orangeburg Road • Orangeburg, NY 10962

Telephone: (845) 359-5100 ext. 261 • Fax: (845) 359-2623

e-mail: supervisor@orangetown.com

website: www.orangetown.com

Thom Kleiner
Supervisor

November 26, 2002

Karl Gleaves

Office of the Assistant General Counsel for Ocean Services

National Oceanic and Atmospheric Administration

United States Department of Commerce

1305 East-West Highway

Silver Spring, MD 20910

Re: Rerouting of Millenium Pipeline

Dear Mr. Gleaves:

On behalf of the Town Board of the Town of Orangetown, I am writing to elaborate upon our serious concerns regarding the rerouting of the Millennium Pipeline as I outlined in oral testimony at the public hearing on this matter on November 13, 2002.

We were first advised that alternate routes had been proposed for the Millennium Pipeline through the Town of Orangetown by a phone call from Rockland County officials on November 12. We were further informed that the final hearing of the U.S. Department of Commerce for the appeal filed by the Columbia Gas Transmission Corporation was to be held the next day, on November 13.

The Town of Orangetown agrees with the concerns enumerated by the County Executive and Director of Environmental Issues of Rockland County in their public hearing and written testimony, including impacts on public safety and the environment.

In addition, the Town has not been formally apprised of the process or the timetable by which the impacts of the alternate routes through the Town will be identified and analyzed. Our residents want and deserve the same time afforded to Westchester County residents to understand the proposed routes and identify its impacts.

November 26, 2002, page 2

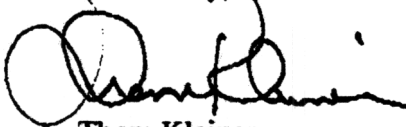
Our knowledge of the location of the proposed alternate routes through Orangetown is extremely limited. We have been presented with a schematic map of Rockland County showing municipal boundaries and major highways at a scale of 1" = 1 mile. The map delineates the proposed routes in a diagrammatic way. At this scale it is not possible to know which properties will be affected nor even which residential roads the routes are adjacent to.

Because of insufficient information, it is not possible to calculate specific impacts. We can surmise that there will be short-term impacts related to construction including commuter and local traffic disruption and rerouting, temporary loss of water or septic services to property and homeowners, and noise from tunneling and blasting through rock. Long-term impacts would include a reduction of buffers along the Palisades Interstate Parkway and destruction of natural habits in Tallman Mountain State Park and the Piermont Marsh.

For all of these reasons, we are requesting additional time to further comment on these matters.

Community concerns to date are outlined in the Town Board resolution attached with this letter. Please advise me of any information that might affect the Town of Orangetown regarding the Millenium Pipeline at the above address or by calling (845) 359-5100, ext. 261. Thank you.

Yours truly,



Thom Kleiner
Supervisor

cc: Town Board
Senator Hillary R. Clinton
Senator Charles E. Schumer
Congressman Benjamin A. Gilman
Congressman Eliot L. Engel
County Executive C. Scott Vanderhoef
State Senator Thomas P. Morahan
Assemblyman-elect Ryan S. Karben

Millenium Pipeline Resolution
Town of Orangetown, Rockland County, New York

Whereas the Millennium Pipeline has been proposed and previously approved to be routed through northern Rockland County and across Haverstraw Bay into Westchester County after careful comprehensive analysis and collaboration with affected communities, and

Whereas years of public comment and hearings, and environmental impact statements all deemed the crossing of Haverstraw Bay to pose the least threat to the coastal management and coastal water resources, and

Whereas a new alternative would route the pipeline through environmentally sensitive portions of the Town of Orangetown, and

Whereas, like the Haverstraw Bay, the Piermont Marsh has been designated a "significant coastal fish and wildlife habitat" by the New York State Department of State, and

Whereas the proposed route through the Town of Orangetown has been mapped only in a schematic manner and is lacking specificity, and

Whereas there are numerous and as yet undetermined environmental and potential economic impacts associated with locating the pipeline within property of the Palisades Interstate Parkway, through Tallman State Park and the Piermont Marsh which have not been identified nor analyzed, and

Whereas the Palisades Interstate Parkway has been designated a National and New York State Scenic Byway in recognition of its environmental, historical and scenic importance to the region, and

Whereas thousands of daily commuters including numerous Orangetown residents using the Palisades Interstate Parkway may experience delays and disruption if construction of the pipeline takes place on the Parkway property, and

Whereas there are public safety and security issues related to the proposed location in close proximity to the existing Tennessee Gas Pipeline, and

Whereas 256 Orangetown homeowners whose property immediately abuts the Palisades Interstate Parkway will be adversely affected by the construction of the pipeline on Parkway property by the permanent removal of the vegetated buffer, by an increase in noise from traffic along the Parkway due to reduced vegetation, by the creation of hazards to the public and by a decrease in property values, and

Now, therefore, the Town Board of the Town of Orangetown hereby declares that it is adamantly and vehemently opposed to any rerouting of the pipeline within Orangetown borders in the absence of a full and comprehensive analysis of all potential adverse impacts and exploration of all possible mitigation measures and approaches to this important matter.

RESOLUTION SUPPORTING CERTIFICATE OF APPROVAL FOR CONSTRUCTION
OF MILLENNIUM PIPELINE ISSUED BY THE FEDERAL ENERGY REGULATORY
COMMISSION, AND OBJECTION TO ALTERNATIVE LOCATIONS SUGGESTED BY
THE NEW YORK STATE DEPARTMENT OF STATE

WHEREAS, the Rockland County Executive and the Rockland County Division of Environmental Resources have informed the Town of Clarkstown that the New York State Department of State has filed an objection to the Certificate of Approval issued by the Federal Energy Regulatory Commission for construction of the Millennium Pipeline, portions of which have already been constructed in Rockland County and which utilize existing utility corridors to minimize impact on the Rockland County community, and

WHEREAS, the New York State Department of State has apparently suggested three alternative routes that the pipeline could utilize, including use of CSX Railroad right-of-way or the Palisades Interstate Parkway right-of-way in the Village of Pomona, and traveling as much as approximately ten (10) miles alongside said Parkway, and thereafter crossing Tallman State Park and the Piermont Marsh prior to crossing the Hudson River into Westchester County, and

2. The PIP is designed for passenger vehicles and in the event of a casualty involving the pipeline, emergency services and repair vehicles would not be able to easily access the right-of-way.

3. The construction of the pipeline in the PIP wooded buffer parallel to the roadway would disrupt road crossing and interfere with emergency services, impact the normal traffic utilizing said roadway, and may result in the pipeline being subject to premature failure due to traffic impacts

4. The loss of the wooded buffer in the PIP right-of-way would result in sound, visual, and air quality impacts to adjacent residents; such impacts would include, and would not be limited, to the increase of respiratory illness, reduction of homes values and loss of open space.

5. Construction of the pipeline would negatively impact the PIP, as well as being contrary to and detrimental to status of the Parkway which is listed on the National Register of Historic places.

6. The PIP has been designated a scenic byway by the New York State Department of Environmental Conservation, and any construction in the wooded buffer would reverse many of the elements that contributed to said designation as a scenic byway.

7. Construction activities in the PIP property would adversely affect the drainage and paving improvements recently completed at great cost to the taxpayers and would greatly inconvenience motorists using the Parkway

8. The route designed by the Secretary of State as "Alternative No. 1 Palisades-Dobbs Ferry" would (a) directly affect about 225 single family homes along the route due to the loss of wooded buffer along the PIP, and indirectly affect at least double that number. (b) Also affected would be the Village Green Condominium development with 112 units, at least one church, and possibly the Hillcrest Elementary School.

9. The route designed by the Secretary of State as "Alternative No. 2 - CSX Railroad-Route 117" would (a) disrupt freight train activities in the Haverstraw Tunnel, directly affect about 170 single family homes and 155 condominium units, and about double that number indirectly. (b) Would cross Gilchrest Road, a Town designated historic road, abut Congers Lake Park (Town park), be perilously close to Lake DeForest Reservoir, the only surface water supply for Rockland County, cross steep mountainous property adjacent to the Mountainview Nature Park (County park), follow Storms Road, a designated Town historic road;

) cross mountainous terrain between Christian Herald Road and Route 9W, dropping down the Palisades escarpment through lands designated for open space protection, and east of Route 9W through the Marydell church property and through or adjacent to Hook Mountain State Park. (c) An alternative to this route continues along the CSX right-of-way past Lake DeForest Dam, close to the Village of Nyack water treatment plant and a large Orange & Rockland Utilities facility, and continues south parallel to Western Highway, crossing the Hackensack River several times. This alternative would affect about the same number of single family homes.

) 10. The route designed by the Secretary of State as "Alternative No. 3 Thruway-Algonquin ROW PIP/Thruway Intersection with Route 240" would (a) directly affect 25-50 single family homes and up to 100 multi-family dwellings and 106 senior citizen units, depending on whether the alignment is on the north or south side of the Thruway. (b) In the event of explosion or fire along the Thruway it is likely that this vital highway would be shut down. (c) An alternative variation would have the pipeline follow Route 304 south of the Thruway, crossing Townline Road This would directly affect up to about thirty homes in

Clarkstown, depending on whether the pipeline is east or west of Route 304. This alternative would threaten and likely result in environmental impacts on Lake Nanuet Park, a major recreational facility in the Town of Clarkstown, and be it

FURTHER RESOLVED, that the Town Clerk shall send a certified copy of this Resolution to the Rockland County Executive, C. Scott Vanderhoef; Executive Director of the Palisades Interstate Park Commission, Carol Ash; Secretary of State of New York, Randy A. Daniels, and to the United States Department of Commerce Secretary, Donald Evans.

Dated: November 26, 2002

Millenium Pipeline objection-na

TOWN OF HAVERSTRAW

ONE ROSMAN ROAD
GARNERVILLE, NEW YORK 10923
(845) 429-2200
Fax (845) 429-4701

FRANK RUNDELL
PAUL PIPERATO
Councilmen

HOWARD T. PHILLIPS, JR.
Supervisor

ISIDRO CANCEL
MICHAEL GRANT
Councilmen

MICHAEL J. GAMBOLI
Director of Finance

WILLIAM M. STEIN
Town Attorney

November 20, 2002

C. Scott Vanderhoef
County Executive
County of Rockland
Allison-Parris County Office Building
New City, NY 10956

Dear Mr. Vanderhoef:

Thank you for your letter of November 14, 2002. We find ourselves in somewhat of a peculiar situation because the proposed millennium gas line has already been constructed by Mirant Corporation through the Town of Haverstraw. The Mirant Corporation placed a 24-inch gas line from New City to their Bowline Plant in Haverstraw.

The Columbia Gas Company has expressed interest in buying that portion of gas line from Mirant if the millennium line proceeds. Therefore, there would be no additional disruption into the Town of Haverstraw. The continuation of the line under the Haverstraw Bay is something that I believe I must leave to the discretion of our experts in the DEC, Rockland County Dept. of Health, and any other governmental and professional engineers and scientists.

Perhaps, the best thing to do is to get Columbia Gas Company to pay a host fee to the local municipality for any detrimental affects that would occur on the environment. Haverstraw has been a good neighbor in hosting power plants. With the construction of a new power generating plant, that is anticipated to begin in the next year or two, Haverstraw will be hosting the burden of the entire County and surrounding Counties so that everyone will have sufficient energy.

Haverstraw should receive a host benefit for both the millennium line and the new power generating plant. No other Town in Rockland County is hosting existing power plants that is powered by natural gas and is going to have a third constructed.

-2-

There should definitely be some type of benefit to our community. I would greatly appreciate your looking into this matter at your earliest convenience.

Very truly yours,

A handwritten signature in black ink, appearing to read "Howard T. Phillips, Jr.", enclosed within a circular stamp or seal.

HOWARD T. PHILLIPS, JR.
SUPERVISOR

HTP:tb

cc: Governor George Pataki
Senator Thomas Morahan
Assemblyman Alexander Gromack
Ilan Schoenberger, County Chairman

MAYOR

Felicia J. Deyrup

TRUSTEE &

Village Mayor

Carol Earmay

TRUSTEES

Edward A. Grant

David J. Smith

Karen Tarapata

VILLAGE OF UPPER NYACK
328 NORTH BROADWAY
UPPPER NYACK, NEW YORK 10960
INCORPORATED 1872

TEL. 845-358-0084 • FAX. 845-358-0741

VILLAGE CLERK

Carol G. Brotherhood

VILLAGE TREASURER

Barry MacCurtney

VILLAGE ATTORNEY

Robert F. Lewis

November 22, 2002

C. Scott Vanderhoef, County Executive
County of Rockland
Allison-Parris County Office Building
New City, NY 10956

Re: Millennium Pipeline route alternatives

Dear Hon. Vanderhoef:

Attached is a certified copy of a Resolution passed by the Village Board of Trustees of the Village of Upper Nyack.

Very truly yours,

Carol G. Brotherhood
Carol G. Brotherhood
Village Clerk

CGB

Cc:

RESOLUTION
VILLAGE OF UPPER NYACK

WHEREAS, the Village Board of the Village of Upper Nyack opposes the Millennium Pipeline route alternatives relating to Rockland County as suggested by the New York Department of State and,

WHEREAS, the Village Board of Upper Nyack supports C. Scott Vanderhoef, the Rockland County Executive and Allan Beers, Coordinator of Environmental Resources in strongly opposing the rerouting of the proposed route for the Millennium Pipeline and,

WHEREAS, changing the route of the pipeline in Rockland would be costly and unnecessary. The Rockland County portion of the Millennium Pipeline has already been constructed by Mirant Energy, in consultation with Rockland officials, along existing utility corridors in order to minimize the impact to residents and,

WHEREAS, the proposed route for the pipeline across Haverstraw Bay was certified by the Federal Energy Regulatory Commission after four years of study. This route is acceptable to both the EPA and the NYSDEC and,

WHEREAS, changing the routing of the Millennium Pipeline so that a crossing could be made further south would have a devastating impact on Rockland County and offer no benefits to the residents of Upper Nyack and,

WHEREAS, routing the pipeline over the steep slopes and mountainous terrain of Hook Mountain and Rockland State Park would require significant blasting of these scenic treasures, both listed as National Historic Landmarks. Bringing the pipeline through the Marydell Faith and Life Center and the property belonging to the Sisters of Christian Doctrine would permanently alter a famous feature of Upper Nyack, the "Meadow." and so,

THEREFORE, BE IT SO RESOLVED THAT we oppose this change in route on economic and environmental grounds. Rockland created a Pipeline Task Force in 1998 to determine a route that would have the least impact on County residents. We support their work. The alternatives proposed will have a significant, long-term permanent impact on our residents and environment.

On a roll call of the vote: AYES 4 NOES 0

Present: Deputy Mayor & Trustee Esmay, Trustees Grant, Smith and Tarapata
Absent: Mayor Deyrup

CERTIFICATION OF RESOLUTION**STATE OF NEW YORK
COUNTY OF ROCKLAND****SS:**

I, Carol G. Brotherhood, Village Clerk of the Village of Upper Nyack, Rockland County, New York, do hereby Certify, that the attached is a true and correct copy of a Resolution adopted by the Board of Trustees of the Village of Upper Nyack at a Regular Meeting held on Thursday, 11/21/02, the original which is on file in the Village Hall, Village of Upper Nyack, Upper Nyack, NY 10960.


(SEAL)

Carol G. Brotherhood
Carol G. Brotherhood, Village Clerk

Dated: 11/22/02

ROCKLAND COUNTY

*ENVIRONMENTAL
ORGANIZATION S*

RESPONSES



**COUNTY OF ROCKLAND
ENVIRONMENTAL MANAGEMENT COUNCIL**

50 Sanatorium Road, Building P

Pomona, New York 10970

Tel. (845) 364-2669

(845) 364-2670

Fax. (845) 364-2671

Email: GruskinD@Co.Rockland.NY.US

DIANE GRUSKIN
Executive Director

PROFESSOR BILL BAKER
Chair

November 25, 2002

Mr. Karl Gleaves
Office of the Assistant General Council for Ocean Services
National Oceanic and Atmospheric Administration
United States Department of Commerce
1305 East-West Highway
Silver Springs, MD 20910

RE: ALTERNATIVE ROUTES TO MILLENNIUM PIPELINE

Dear Mr. Gleaves:

The Rockland County Environmental Management Council (EMC) supports Rockland County Executive C. Scott. Vanderhoef's strong letter of opposition to proposed alternative Millennium Pipeline routes through Rockland County. Please see copy attached.

Our county has already been pummeled by the Millenium Pipeline across its entire width. It appears now we are expected to host routes proposed by the NYS Department of State that would permanently impact our environment and spoil the quality of life for many, many residents.

Without the courtesy of advance warning, Rockland County was blindsided by the sudden scheduling of the November 13, 2002 public hearing in Westchester County, as well as the short response time for written comments. At the very least, our citizens deserve a well-publicized public hearing on our side of the River, since they will bear the full brunt of these routes.

For twenty-eight years EMC has been part of a collaboration of citizens and government dedicated to preserving Rockland's natural resources for future generations. Now our hard won treasures - including the scenic integrity of the Palisades Interstate Parkway and the sanctity of the Piermont Marsh - are to be sacrificed for the benefit of powerful forces elsewhere without regard for us.

We find these actions by the NYS Department of State totally unacceptable and request that the original crossing accepted by the NYS DEC and US EPA across Haverstraw Bay be retained as least damaging to the greater number of people and the environment.

Very truly yours,

Diane Gruskin
Attachment



Rockland County Conservation Association, Inc.

FOUNDED 1930

P.O. Box 213, Pomona, New York 10970

Tel. (845) 354-1071 Fax. (845) 354-7563

November 22, 2002

Mr. Karl Gleaves
Office of the Assistant Counsel for Ocean Services
National Oceanic and Atmospheric Administration
United States Department of Commerce
1305 East-West Highway
Silver Springs, Maryland 20910

Dear Mr. Gleaves:

The Rockland County Conservation Association, founded in 1930, works to preserve, protect and conserve our natural resources. Four years ago, it filed for intervenor status in the Millennium Pipeline case before the Federal Energy Regulatory Commission.

The New York Department of State (DOS) has proposed alternative routes for the Millennium Pipeline. These alternatives, subject of a public hearing held on November 13, 2002, would critically impact Rockland County. For sound environmental reasons, the Rockland County Conservation Association wishes to register its strong opposition to the alternative routes. (Please note that short notice was given for the public hearing, the hearing was not held in Rockland County, and little time has been allowed for public comment.)

The adverse impacts of the DOS preferred option, Palisades-Dobbs Ferry Route, as well as the impacts of the other options proposed, are precisely described in the attached letter from Rockland County Executive C. Scott Vanderhoef, sent to you on November 12, 2002. The Rockland County Conservation Association most emphatically supports Mr. Vanderhoef's statement.

Except for the five boroughs of New York City, Rockland County is the smallest county in New York State. Considering its size, it has already received more than its share of natural gas pipelines, high voltage transmission lines, power plants, huge substations and transportation corridors. At this rate it will become nothing more than a conduit serving other regions.

In this instance, Rockland's residents and environment must not be made to suffer the consequences of the New York Department of State's incredible proposals.

We ask that our objections be made part of the hearing record, and we thank you for the opportunity to comment.

Sincerely,

Betty Hedges
Betty Hedges
President

ROCKLAND COUNTY
CIVIC ASSOCIATION'S
RESPONSES



**THE LEAGUE OF WOMEN VOTERS
OF ROCKLAND COUNTY
P.O. Box 363
Suffern, NY 10901**

November 22, 2002

Re: Hearing and comment period on proposed alternatives to Millennium Pipeline Hudson River crossing

Mr. Karl Gleaves
Office of the Assistant General Counsel for Ocean Services
National Oceanic and Atmospheric Administration
United States Department of Commerce
1305 East-West Highway
Silver Springs, MD 20910

Dear Mr. Gleaves:

It is the position of the League of Women Voters of the United States that *“governmental bodies must protect the citizen’s right to know by giving adequate notice of proposed actions, holding open meetings and making public records accessible.”*

In light of this, the League of Women Voters of Rockland County contends that the Public Meeting held by the United States Department of Commerce in Westchester County on November 13, 2002, on the Millennium Pipeline Hudson River crossings violated the rights of Rockland County residents on the following grounds:

1. Four alternative crossings that would directly affect Rockland County residential areas and environmentally sensitive areas were proposed.
2. Rockland County residents were not adequately notified that these proposals were to be presented.
3. Since Rockland County residents will be significantly affected by these proposals, this meeting should have been held in Rockland County or a subsequent meeting in the county should have been scheduled.
4. The period after the November 13 meeting during which the public could submit comments on this, with a deadline of December 2, should have been longer than the two-and-a-half weeks that included the four-day Thanksgiving holiday. This provided only 11 working days for the study, review, and formulation of opinion on these proposals.

Therefore, we urge the Department of Commerce to do the following:

1. Schedule a public hearing in Rockland County on these proposals with adequate notice to the public through the popular media; and

2. Extend the deadline for comments on these proposals for at least 30 days after that hearing is held.

At the very least, the current deadline for comments should be extended to at least 30 days after the November 13 meeting.

Respectfully submitted

A handwritten signature in black ink, appearing to read "Patricia Soto June Howard". The signature is written in a cursive, flowing style.

Patricia Soto & June Howard
Co-Presidents

Cc: Governor George Pataki
NY Department of State Randy Daniels
County Executive C. Scott Vanderhoef

)

15 Horne Tooke Road
Palisades, New York 20964
November 26, 2002

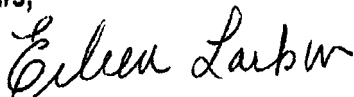
Mr. Karl Gleaves
Office of the Asst. Council for NOAA
U.S. Department of Commerce
1305 East/West Highway
Silver Springs, Maryland 20910

Dear Mr. Gleaves:

On behalf of the Palisades Civic Association, we would like to go on record as objecting to the rerouting of the Millennium Pipeline thru Orangetown.

We concur with the valid objections given in C. Scott Vanderhoef, County Executive, letter of November 12, 2002 addressed to you. It is hoped you will take these objections into consideration in determining the route which will have the least impact on homes, the environment in our area.

Sincerely yours,



Eileen M. Larkin, President of the Palisades Civic Association

ROCKLAND COUNTY
CITIZEN'S
RESPONSE

Mr. Patrick J. Healy
149 Prospect Street
Nanuet, NY 10954

November 26, 2002

Mr. Karl Gleaves
Office of Assistant General Coun. For NOAA
U.S. Department of Commerce
1305 East/West Highway
Silver Springs, MD 20910

Re: Millennium Gas Pipeline Route - Rockland County, NY

Dear Mr. Gleaves:

I was outraged to learn this week that an alternative to the long-discussed, previously-approved and certified project above has been suggested.

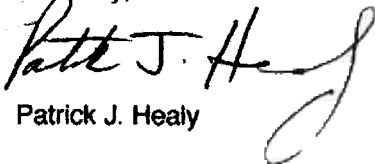
This would be a disaster for Rockland County, and the Town of Clarkstown in particular. It must not happen.

The original pipeline route certified by FERC must be utilized, as opposed to the alternative proposed by the New York Department of State for the following reasons:

- 1) **Safety of our Residents**- the suggested alternative would situate this potentially-hazardous gas pipeline very close to many single-family homes, schools, libraries, and key evacuation emergency routes. **This would needlessly expose our residents to the unacceptable danger of explosion and fire in the event of a pipeline rupture or digging accident.**
- 2) **Loss of Buffer**- the alternative would further negatively impact Rockland residents from an environmental point of view, as numerous acres of tree buffer would be lost. Existing trees and vegetation protect our residents from air and noise pollution, while absorbing water to facilitate drainage and avoid flooding problems.
- 3) **Traffic & Utilities**- In addition to the above, the suggested alternative to this project would require many more miles of massive amounts of digging and excavation for pipeline installation. This would cause huge traffic problems near main and secondary roadways. Area highways, parkways, and other roads are already saturated with traffic. To add to this would be irresponsible, and make the existing bad situation much worse. This would also cause disruptions and other problems with our existing utility systems, further impacting our residents.

If the proposed pipeline is to go through Rockland County, it should only be permitted to run along the already-certified FERC route. This route has much of the needed pipeline already in place, and would cause the least amount of danger and other adverse impacts to our residents. Thank you for your assistance in this matter.

Sincerely,



Patrick J. Healy

Cc: C. Scott Vanderhoef, Rockland County Executive
R. Allen Beers, Rockland County Environmental Coordinator
Charles Holbrook, Supervisor, Town of Clarkstown
Clarkstown Town Council Members